

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SAMUEL GONZALEZ CASTRO,  
a/k/a “Klei,”  
EFERSON MORILLO-GOMEZ,  
a/k/a “Jefferson,” and  
JARWIN VALERO-CALDERON,  
a/k/a “La Fama,”

Defendants.

**Affirmation in Support of  
Application for Order of  
Continuance**

24 Mag. 4180

State of New York )  
County of New York : ss.:  
Southern District of New York )

Jun Xiang, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Edward Y. Kim, Acting United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A).

2. The defendants was charged in a complaint dated December 4, 2024, with violations of 18 U.S.C. §§ 371, 1951, 2119, 924(c), 924(o), and 2. Defendants EFERSON MORILLO-GOMEZ and JARWIN VALERO-CALDERON were arrested on December 5, 2024, and presented in this District on December 6, 2024, before Magistrate Judge Henry J. Ricardo. MORILLO-GOMEZ is represented by Joanne Loughnane, Esq. and Michael Mann, Esq., and VALERO-CALDERON is represented by Thomas Dunn, Esq. Defendant SAMUEL

GONZALEZ CASTRO was arrested on December 12, 2024 and presented in this District the same day, before Magistrate Judge Robyn F. Tarnofsky. CASTRO is represented by Patrick Joyce, Esq. All three defendants were ordered detained at the time of their presentments.

3. At the presentments of MORILLO-GOMEZ and VALERO-CALDERON on December 6, 2024, the preliminary hearing deadline was scheduled for January 5, 2025, after defense counsel consented to extend the deadline within which to conduct a preliminary hearing. Under the Speedy Trial Act, the Government had until January 6, 2025 within which to file an indictment or information.<sup>1</sup> *See* 18 U.S.C. § 3161(b). At the presentment of CASTRO on December 12, 2024, the preliminary hearing deadline was scheduled for January 10, 2025, after defense counsel consented to extend the deadline within which to conduct a preliminary hearing. Under the Speedy Trial Act, the Government had until January 13, 2025 within which to file an indictment or information.<sup>2</sup> *See* 18 U.S.C. § 3161(b).

5. Defense counsel and I have had discussions regarding a possible disposition of this case. The parties plan to continue our discussions, but do not anticipate a resolution before January 5, 2025, the preliminary hearing date for MORILLO-GOMEZ and VALERO-CALDERON, or January 10, 2025, the preliminary hearing date for CASTRO.

6. Therefore, the Government requests a continuance, as to all three defendants, until February 4, 2025—which is 30 days from the earlier preliminary hearing date of January 5, 2025—to continue the foregoing discussions toward resolving this matter. On December 20 and 23, 2024, I personally corresponded with defense counsel, who confirmed by email that each of

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<sup>1</sup> January 5, 2025 falls on a weekend.

<sup>2</sup> January 11, 2025 falls on a weekend.

the three defendants consented to a 30-day extension of the preliminary hearing and Speedy Trial Act deadlines and specifically consented to this request.

7. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
December 30, 2024

/s/ Jun Xiang  
Jun Xiang  
Assistant United States Attorney  
212-637-2289